

EXHIBIT D

From: Reid Skibell
Sent: Monday, June 6, 2022 11:31 AM
To: James Vlahadamis
Subject: RE: Shoreline v. Herbst et. al.

James,

We served the subpoena on your client in mid-March, well before the discovery deadline. We could not conduct the deposition before the discovery deadline because you claimed your client was unavailable. You cannot delay in responding to a valid subpoena and then assert that the deposition cannot take place without leave of court because a discovery deadline has passed. If you have authority which is contrary to our understanding of the law, please circulate it. Please provide us with deposition dates.

Thanks,

Reid

Reid Skibell
W: 212.358.5600
M: 917.293.0542
rskibell@glennagre.com

GLENN AGRE
BERGMAN & FUENTES 

55 Hudson Yards, 20th Floor
New York, NY 10001

From: James Vlahadamis <james@vhlawny.com>
Sent: Monday, June 6, 2022 9:46 AM
To: Reid Skibell <RSkibell@glennagre.com>
Subject: Re: Shoreline v. Herbst et. al.

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Reid,

Good morning, without waiving any objections, we are searching for and plan to produce any and all responsive documents. It is my understanding that the date for depositions has expired and if you want to take my client's deposition, you would need leave of court, if I am misunderstanding this please let me know. I am out of the office today, but available by email, as today is the last day of festivities for my brother's wedding.

Sincerely,

James F. Vlahadamis, Esq.
Vlahadamis & Hillen, LLP
Attorneys at Law

james@vhlawny.com

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148 East Montauk Highway, Suite 3

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From: Reid Skibell <RSkibell@glennagre.com>

Sent: Friday, June 3, 2022 2:47:08 PM

To: James Vlahadamis <james@vhlawny.com>

Subject: RE: Shoreline v. Herbst et. al.

Ok, I look forward to your response. Enjoy the wedding.

Reid Skibell

W: 212.358.5600

M: 917.293.0542

rskibell@glennagre.com

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BERGMAN & FUENTES 

55 Hudson Yards, 20th Floor
New York, NY 10001

From: James Vlahadamis <james@vhlawny.com>

Sent: Friday, June 3, 2022 11:53 AM

To: Reid Skibell <RSkibell@glennagre.com>

Subject: RE: Shoreline v. Herbst et. al.

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Reid,

I'm out of the office for my brother's wedding this weekend. I'll be back in the office on Monday and will respond by Monday morning after I have had a chance to speak with my client.

Sincerely,

James F. Vlahadamis, Esq.

Vlahadamis & Hillen, LLP
Attorneys at Law

james@vhlawny.com
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From: Reid Skibell <RSkibell@glennagre.com>
Sent: Friday, June 03, 2022 10:59 AM
To: James Vlahadamis <james@vhlawny.com>
Subject: RE: Shoreline v. Herbst et. al.

James,

I am following up on the subpoena one last time. Please confirm that your client is going to agree to appear for a deposition and you will be producing the following documents: All correspondence between your clients and John Kelly and/or Andrea Collingswood over the relevant time period, any analyzes of different iterations of the Cape Air transaction, and any documents relating to Shoreline's purported damages in this matter.

Reid Skibell

W: 212.358.5600

M: 917.293.0542

rskibell@glennagre.com

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55 Hudson Yards, 20th Floor
New York, NY 10001

From: James Vlahadamis <james@vhlawny.com>

Sent: Thursday, June 2, 2022 1:44 PM

To: Reid Skibell <RSkibell@glennagre.com>

Subject: RE: Shoreline v. Herbst et. al.

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Reid,

I can assure you that I will not be intimidated by your threats as I have reviewed the docket and have seen your lack of success on motions to compel. I don't know what you would like to discuss as we have agreed to provide responsive documents next week, however, if you want to discuss something specific, please provide times you are available for a call.

According to the docket, the deadline for depositions has expired, but if you think I am reading that wrong, I'm happy to discuss that as well.

Sincerely,

James F. Vlahadamis, Esq.

Vlahadamis & Hillen, LLP
Attorneys at Law

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From: Reid Skibell <RSkibell@glennagre.com>

Sent: Thursday, June 02, 2022 10:27 AM

To: James Vlahadamis <james@vhlawny.com>

Subject: RE: Shoreline v. Herbst et. al.

James,

Respectfully, we are not going to let you run out the clock on discovery in this matter or cherry-pick documents that you believe will help Mr. Kriegsman. Moreover, you failed to serve any responses or objections to the subpoena. I believe if you do a little research that means you have waived the right to object based on, for example, purported burden.

There needs to be an appropriate process in place for responding to the subpoena. Please confirm that you are going to produce, at a minimum, all correspondence between your clients and John Kelly and/or Andrea Collingswood over the relevant time period, any analyzes of different iterations of the Cape Air transaction, and any documents relating to Shoreline's purported damages in this matter.

Separately, I have asked you multiple times for deposition dates. Please provide them without further delay or we will have no choice but to move to compel.

Best,

Reid

Reid Skibell

W: 212.358.5600

M: 917.293.0542

rskibell@glennagre.com

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55 Hudson Yards, 20th Floor
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From: James Vlahadamis <james@vhlawny.com>
Sent: Wednesday, June 1, 2022 7:29 PM
To: Reid Skibell <RSkibell@glennagre.com>
Subject: RE: Shoreline v. Herbst et. al.

[EXTERNAL EMAIL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Reid,

We haven't waived anything, as I said below, we will be producing the documents by next week.

I will happy to speak with you after you have had the opportunity to review the production.

Sincerely,

James F. Vlahadamis, Esq.

Vlahadamis & Hillen, LLP
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From: Reid Skibell <RSkibell@glennagre.com>
Sent: Wednesday, June 01, 2022 1:28 PM
To: James Vlahadamis <james@vhlawny.com>
Subject: RE: Shoreline v. Herbst et. al.

James,

I suggest we find a time to discuss how the documents were collected and what you are producing, particularly since you failed to serve any responses and objections and thus have waived the right to do so. When are you available? Also, I need deposition dates; please provide them without further delay.

Regards,

Reid

Reid Skibell
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M: 917.293.0542
rskibell@glennagre.com

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55 Hudson Yards, 20th Floor
New York, NY 10001

From: James Vlahadamis <james@vhlawny.com>
Sent: Wednesday, June 1, 2022 1:22 PM
To: Reid Skibell <RSkibell@glennagre.com>
Subject: RE: Shoreline v. Herbst et. al.

[EXTERNAL EMAIL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Reid,

We will be producing documents to you next week with respect to the subpoena served on Camille Murphy.

Sincerely,

James F. Vlahadamis, Esq.

Vlahadamis & Hillen, LLP
Attorneys at Law

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From: James Vlahadamis <james@vhlawny.com>
Sent: Tuesday, May 31, 2022 7:34 PM
To: Reid Skibell <RSkibell@glennagre.com>
Subject: Re: Shoreline v. Herbst et. al.

I will get back to you tomorrow.

Sincerely,

James F. Vlahadamis, Esq.
Vlahadamis & Hillen, LLP
Attorneys at Law
james@vhlawny.com
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From: Reid Skibell <RSkibell@glennagre.com>
Sent: Tuesday, May 31, 2022 6:54:12 PM
To: James Vlahadamis <james@vhlawny.com>
Subject: FW: Shoreline v. Herbst et. al.

James,

While my preference would be to avoid motion practice, if I don't receive documents and dates for a deposition promptly, you are going to leave me with no choice. Please let me know if your client is going to comply with the subpoena.

Regards,

Reid

Reid Skibell
W: 212.358.5600
M: 917.293.0542
rskibell@glennagre.com

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55 Hudson Yards, 20th Floor
New York, NY 10001

From: Reid Skibell
Sent: Sunday, May 22, 2022 9:01 AM
To: James Vlahadamis <james@vhlawny.com>
Subject: RE: Shoreline v. Herbst et. al.

James,

I received no response to my last email. Please let us know when we will receive documents and when your client is available for her deposition.

Regards,

Reid

Reid Skibell
W: 212.358.5600
M: 917.293.0542
rskibell@glennagre.com



55 Hudson Yards, 20th Floor
New York, NY 10001

From: James Vlahadamis <james@vhlawny.com>
Sent: Thursday, May 12, 2022 4:47 PM
To: Reid Skibell <RSkibell@glennagre.com>
Subject: RE: Shoreline v. Herbst et. al.

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Thanks for the email Reid, I will follow up with my client and get back to you.

Sincerely,

James F. Vlahadamis, Esq.

Vlahadamis & Hillen, LLP
Attorneys at Law

james@vhlawny.com
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named addressee(s). If the information is accidentally read by an unintended recipient the information is not to be used in any way nor disclosed to any other party.

From: Reid Skibell <RSkibell@glennagre.com>
Sent: Wednesday, May 11, 2022 8:14 AM
To: James Vlahadamis <james@vhlawny.com>
Subject: RE: Shoreline v. Herbst et. al.

James,

Can you please give me an update on where this stands?

Thanks,

Reid

Reid Skibell
W: 212.358.5600
M: 917.293.0542
rskibell@glennagre.com

GLENN AGRE
BERGMAN & FUENTES 

55 Hudson Yards, 20th Floor
New York, NY 10001

From: James Vlahadamis <james@vhlawny.com>
Sent: Monday, April 11, 2022 6:47 PM
To: Reid Skibell <rskibell@hs-law.com>; Reid Skibell <RSkibell@glennagre.com>
Cc: Afrodite Fountas <afountas@hs-law.com>
Subject: Shoreline v. Herbst et. al.

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Mr. Skibell,

My office will be representing Camille Murphy in connection with the subpoena you issued in this case. It is the middle of tax season and we will need an additional three (3) weeks to search for and gather any responsive documents for production.

Thanks in advance for your consideration.

Sincerely,

James F. Vlahadamis, Esq.

Vlahadamis & Hillen, LLP
Attorneys at Law

james@vhlawny.com
www.vhlawny.com

148 East Montauk Highway, Suite 3
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